

To the authors of *A Vision for Durable Management of a Sustainable Delta*:
9/22/07

In response to your September 11 request for comments on your "first, embryonic draft [report] prepared by staff" of the Delta Vision Blue Ribbon Task Force, I have attached my three-page review of your draft document, which I found to be "a good first step."

Please feel free to phone or e-mail me if you have any questions or comments about the attached document. Thanks.

Jim Rich
Economist,
California Department of Water Resources

Comments on *A Vision for Durable Management of a Sustainable Delta*
A "first, embryonic draft prepared by [the Delta Vision Blue Ribbon Task Force] staff (September 11, 2007)"
"To be discussed at the Blue Ribbon Task Force meeting September 20-21, 2007"

Draft comments by Jim Rich, Economist, DWR, DPLA. 22 September 2007.

This document needs a date, and a listing of the names and affiliations of the authors.

Last sentence in the first paragraph, Page 2: "... several generations" should be changed to "future generations" or "all generations", for obvious reasons.

Concerning the last sentence in the third paragraph, Page 2: The text should make it clear that although "ecosystem protection and water provision" are indeed two "overriding priorities" for the Delta, they aren't the only priorities for the Delta. The Delta is also the location of over 370,000 acres of fertile, irrigated farmland.

Concerning the sixth paragraph on Page 2: It is good that the concept of "resiliency" is emphasized here and elsewhere in the document. I suggest using the term "adaptive management" several times in the text, for that is a key component of resiliency.

Concerning the table on Page 3, from top-to-bottom:

As a future condition, we do not want a water system built on "regional self sufficiency." This would be a social and economic disaster, and could even harm the environment in certain regions. An advanced, complex, interdependent, coordinated water system has been developed to serve Californians during the past 100+ years. We should not abandon it, which would be required by a water

system built on regional self sufficiency. We need more water transfers, not fewer. More water marketing, not less. More inter-regional cooperation, not less. We need more surface and ground water storage facilities that will provide water not just for the region in which they are located, but for other regions around the state.

Increased interstate and international trade and commerce result in economic development and greater prosperity for all societies. In a similar manner, concerning our water resources, increased cooperation among California's regions will provide a more efficient, effective, resilient, and sustainable water system.

Change "primary food production" to either "food production" or "agricultural output."

Change "reliable conveyance around or through the Delta" to "reliable conveyance around and/or through the Delta."

On Page 4: Many lay readers may not know what is meant by "sunny day [levee] failures." This term should be explained, along with a brief description as to what can cause such failures.

Concerning the next-to-last paragraph on Page 5: What good is a "vision" if it can not be made to happen? What good is a "desired future" if it cannot be achieved? Shouldn't we choose between do-able, feasible alternatives, and not commit ourselves to trying to reach a "vision" of a "desired future", which could be unattainable?

Concerning the last paragraph on Page 5: I suggest changing "durable management" to "durable, adaptive management."

On Figure 1, Page 6: I have seen better one-page maps of the Delta. This one was not legible when I printed it out. It also needs county boundaries.

Page 8: This is a good, one-page description of the people and organizations involved in the Delta Vision process.

Page 9: Concerning the "hundreds of jurisdictions and agencies" involved with governing the Delta: I cannot recall a single instance in this document when the premier such agency, the Delta Protection Commission, is named. Many times during the past four years I have heard or read different Delta stakeholders call for a strengthened Delta Protection Commission. This draft document should acknowledge the important role that Commission must play in any discussion and implementation of solutions to the Delta's many problems.

Concerning the last paragraph on Page 9, continuing on to the top of Page 10:

A common definition of "short-term" is a year or less. By this definition, the Delta is sustainable in the short-term. It is quite possible that within the coming year the Delta will remain pretty much as it is today. But it is clearly not sustainable in its current form in either the medium- or long-terms. Also, the call for a "substantially new approach to managing the Delta" is misplaced. Yes, we may need a truly new approach. But it could also be true that one of the approaches to managing the Delta already proposed by the Public Policy Institute of California or other organizations in recent years could be just what is needed for the Delta. We should try different approaches, even if one or more of those approaches to managing the Delta have already been proposed. We should build on the good work already done in recent years by organizations such as the University of the Pacific and the Delta Protection Commission.

In the next-to-last paragraph on Page 10, the word "Tules" should not be capitalized.

On Page 11, the second paragraph of the "A vision for California's Delta" section includes the phrase "work in reversible steps." This may be feasible and desirable for implementing some proposed solutions to some Delta problems. But it is neither feasible nor desirable for implementing two major proposed solutions: a through-Delta "armored water conveyance channel" and a "bypass Delta conveyance facility."

On Page 12 is additional discussion of "building greater regional water self-sufficiency", which I have already commented upon.

The next-to-last paragraph on Page 12 begins with "Achieving this separation must proceed in a staged, transparent, and reversible manner, ..." But then the last paragraph on the page states "This may mean creating multiple pathways for water conveyance so critical water supplies cannot be interrupted completely by levee failures, salinity intrusion, or other sudden changes." This is an obvious reference to building both a through-Delta "armored water conveyance channel" and a "bypass Delta conveyance facility." But neither of these projects can be built in a "reversible manner." Once you spend over a billion dollars to build such a project, are you going to spend hundreds of millions of dollars to destroy it and return the area where it was built to its pre-project condition?

Overall comments:

The text implies that all of the CVP relies on Delta water exports. This is not the case.

There is very little mention of the economic, social, and environmental importance of Delta agriculture.

There is no discussion of the need for more salt water flows into more of the Delta, so as to more closely resemble its original, natural condition, and so help

fight the invasion of non-native plant and animal species which are harming the native species, such as the Delta smelt.

Finally, the staff's draft document appears to largely ignore the draft report recently done by URS Corporation for DWR, "*Status and Trends of Delta-Suisun Services*." The document also ignores several recent major speeches by our Governor which mentioned the Delta and several proposed solutions to its problems. Finally, the draft document appears to ignore many of the findings, conclusions, and recommendations in the important, path-breaking 2/07 report by the Public Policy Institute of California, *Envisioning Futures for the Sacramento-San Joaquin Delta*.

In short, although the staff's draft report is thoughtful, well-written, and interesting, it does not appear to fully incorporate some of the most recent, useful work involving the Delta and its problems. I look forward to reviewing a slightly-expanded, updated, revised draft version of the staff's 9/11/07 "embryonic draft" report on the Delta. The September 11 draft is a good first step. Best wishes on the revision.